

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DAVID LEIBOWITZ, BENJAMIN
LEIBOWITZ, JASON LEIBOWITZ,
AARON LEIBOWITZ, and PINCHAS
GOLDSHTEIN

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW
INC., TETHER HOLDINGS LIMITED,
TETHER OPERATIONS LIMITED,
TETHER LIMITED, TETHER
INTERNATIONAL LIMITED,
DIGFINEX INC., PHILIP G. POTTER,
GIANCARLO DEVASINI,
LUDOVICUS JAN VAN DER VELDE,
REGINALD FOWLER, CRYPTO
CAPITAL CORP., and GLOBAL TRADE
SOLUTIONS AG,

Defendants.

Case No. 1:19-cv-09236-KPF

Honorable Katherine Polk Failla

DECLARATION OF KYLE W. ROCHE

I, Kyle W. Roche, declare as follows:

1. I am a partner at Roche Freedman LLP, counsel for Plaintiffs David Leibowitz, Benjamin Leibowitz, Jason Leibowitz, Aaron Leibowitz, and Pinchas Goldshtein. I make this declaration in support of Plaintiffs' motion to seek appointment of their counsel, Roche Freedman LLP ("RF") and Schneider Wallace Cottrell Konecky ("SWCK"), as interim class counsel pursuant to Rule 23(g).

2. Attached hereto as Exhibit 1 is a true and correct copy of RF's attorney profiles

and recent news coverage of the firm's representation in *Kleiman v. Wright*, No. 18-CV-80176 (S.D. Fla.).

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true.

Executed on January 3, 2020 at Miami, FL.

By: _____ *Kyle W. Roche*
Kyle W. Roche